

STEIN & VARGAS LLP

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August 28, 2017

The Honorable Raymond J. Dearie
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *T.W. v. N.Y.S. Board of Law Examiners, et al.*, 1:16-cv-03029-RJD-RLM

Dear Judge Dearie:

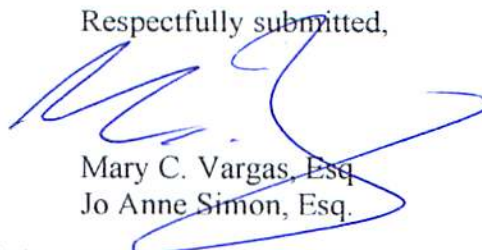
In the interests of justice and to protect confidential medical information, Plaintiff hereby requests that filings containing the full name of the Plaintiff in the above-noticed matter be sealed and that hereafter the matter proceed using only the Plaintiff's initials to protect the privacy of confidential medical information relating to Plaintiff. Counsel for Defendants does not consent to this request.

This Court has the discretion to order that a case proceed using only a plaintiff's initials. *See, e.g., Doe v. Hartford Life & Accident Ins. Co.*, 237 F.R.D. 545, 548 (D.N.J. 2006) ("It is within a district court's discretion to determine when a party may proceed anonymously."); *see also Sealed Plaintiff v. Sealed Defendant #1*, 537 F.3d 185, 190 (2d Cir. 2008) (holding that a district court's determination whether to order a case to proceed anonymously is reviewed only for abuse of discretion).

Plaintiff filed a complaint alleging discrimination based on disability. Such filing included confidential, medical information about the Plaintiff. The Plaintiff seeks protection of her private medical information through sealing of the Complaint and by proceeding with her initials only in the caption. Protecting Plaintiff's private medical information in no way prejudices Defendants.

Counsel is prepared to fully brief this issue at the Court's request.

Respectfully submitted,



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